

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Marcus Shauntrell Bond

Case: 4:24-mj-30206

Judge: Ivy, Curtis

Filed: 05-29-2024

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 26, 2024 & May 27, 2024 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1);

21 U.S.C. § 841(a)

Possession of ammunition as a convicted felon;

Illegal distribution, delivery, or possession with intent to distribute  
narcotics

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 29, 2024City and state: Flint, Michigan  
Complainant's signature

Special Agent Nate Sutara, ATF

Printed name and title



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

1. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since May 2018. I am currently assigned to the Detroit, Michigan Field Division, Flint Field Office. I am tasked with investigating violations of firearms and narcotics laws. Before working with ATF, I was employed by the Michigan Department of State Police (MSP) for approximately five years. I held several positions with MSP, including Detective/Trooper with the Major Case Unit in Saginaw. During this employment, I investigated numerous incidents involving robberies, shootings, and homicides as well as violations of state and federal firearms laws.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. Based on the facts below, there is probable cause to believe that on May 26, 2024, Marcus Shauntrell Bond violated 18 U.S.C. § 922(g)(1), possession of

ammunition as a convicted felon, and violated 21 U.S.C. § 841(a), illegal distribution, delivery, or possession with intent to distribute narcotics on May 27, 2024.

### ***Background***

4. On May 26, 2024, at approximately 08:52 PM., Officers from the Flint Police Department responded to 33\*\* Martin Luther King Avenue referencing a shooting. Upon his arrival, Police made contact with the victim (AV-1). AV-1, who was involved in a traffic crash at the above listed venue, was sitting in the passenger compartment of a silver Ford Explorer.

5. As Police spoke with AV-1 they observed he had a gunshot wound to his left arm. AV-1 stated he had been shot at the Marathon Gas Station located at 2905 N. Saginaw St. During an on-scene interview, AV-1 described the suspect who shot him as a black male with dreads, wearing all black. AV-1 estimated three to four shots had been fired. When asked, AV-1 stated he was unable to identify the suspect who shot him. AV-1 was ultimately transported to Hurley Medical Center (HMC) where he was listed in critical condition.

6. Police then responded to the Marathon Gas Station located at 2905 N Saginaw St. At this time, Police observed two spent 9mm casings near the front door of the gas station. As a result, Police secured the scene for detectives.

7. Flint's Major Crimes Team was activated and responded to the scene. At this time, the Marathon Gas Station attendant who stated the shooting was captured on the building's surveillance cameras.

8. Detectives were able to review and extract the surveillance video from the time of the incident. Below is a depiction of the main events captured by surveillance video relevant to the shooting on May 26, 2024.

- At approximately 8:45 pm, a male wearing dark clothing with a hood (later identified as AV-1) walks up to a male wearing a green t-shirt and multi-colored shorts (later identified as Marcus Bond)
- Bond was speaking to an individual sitting inside a pickup truck near one of the gas pumps
- AV-1 shows something to Bond causing him to retreat by backing up toward the front entrance of the Marathon
- At one point Bond puts his arms up and then down in quick succession
- Both aforementioned males have a verbal altercation at the door of the Marathon. At approximately 8:45:33 PM Bond pulls out a pistol and shoots AV-1. At approximately the same time, the male wearing dark clothing also appears to be holding a pistol. Based on the interview with AV-1, he advised this was a BB gun.

- AV-1 turns around and attempts to run away but falls in between some of the gas pumps. He gets up holding a black object in his hand which appears to be a firearm.
- AV-1 gets in the driver's seat of a dark gray/silver Ford Explorer and turns north on Saginaw St.
- At approximately 8:45:49 PM the door to the gas station opens and Bonds runs north out of view of the camera.

9. On May 27, 2024, at approximately 1547 hours, Flint Police again responded to the Marathon Gas Station located at 2905 N. Saginaw St. Flint, MI referencing a disorderly person. The caller stated that an approximately forty (40) year old black male dressed in a blue hoodie and mask was at the store questioning the clerk about the video footage that captured the shooting the day prior.

10. The caller recognized the male as the suspect from this shooting as he was a witness to the actual shooting itself. The caller stated that the male was banging on the front door of the business as he locked all doors and hid behind the bullet proof glass and waited for police to arrive.

11. Upon arrival, police observed Bond sitting in front of the store wearing a blue coat with flames on it. Bond was ordered by police to walk towards him; however, Bond began to flee the scene on foot. Police continued to follow Bond

while requesting additional units to respond to the area to aid him with Bond's apprehension. After losing briefly losing sight of Bond, officers observed Bond walk across the south side of Leith St. west of Saginaw St. It should be noted that Bond was now only wearing a red T-shirt. Bond observed Police and continued running north bound across Leith St. into a grassy area. Police ultimately parked his patrol vehicle, retrieved his K9 Partner Luca, and commanded him to apprehend Bond. Bond was ultimately taken into custody following a K9 use of force incident.

12. A search of the surrounding area for Bond's blue coat with flames on it was conducted. It was subsequently located at 618 Leith Street. Inside of the hoodie was a set of keys, a gray washcloth, one black glove, and a large amount (32.5 Grams) of what was believed to be cocaine base (Packaged in a clear knotted plastic baggie). Police collected these items and secured it in their marked patrol vehicle. In my training and experience, that amount of cocaine base is consistent with an intent to distribute and not personal use.

13. A criminal history check was completed for Bond. After completing this check and reviewing Bonds' criminal history, I observed that Bond had been convicted of the following felony offenses:

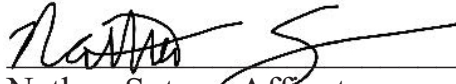
- 05/08/2001 Felony Del-MFG Controlled Substance (7<sup>th</sup> Circuit Court)
- 06/14/2004 Felony Controlled Substance Possession (7<sup>th</sup> Circuit Court)

- 02/27/2017 Felony Del-MFG Controlled Substance (7<sup>th</sup> Circuit Court)
- 02/27/2017 Felony Jails – Furnishing Contraband to Prisoners (7<sup>th</sup> Circuit Court)
- 10/31/2018 Felony Assault with Dangerous Weapon (7<sup>th</sup> Circuit Court)
- 06/24/2020 Felony Del-MFG Controlled Substance (7<sup>th</sup> Circuit Court)

14. On March 29<sup>th</sup>, 2024, I contacted Interstate Nexus Expert ATF Special Agent Dustin Hurt. SA Hurt advised, based upon the description provided (Two Speer 9mm Luger Shell Casings), without physically examining the ammunition, that the ammunition is ammunition as defined under 18 U.S.C. § 921 and was manufactured outside of the state of Michigan after 1898, and therefore the ammunition had traveled in and affected interstate commerce.

15. Based on the foregoing, I have probable cause to believe that on May 26, 2024, in the Eastern District of Michigan, Marcus Shauntrell Bond, knowing that he had been convicted of a felony offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, ammunition,

in violation of 18 U.S.C. § 922(g)(1). Also based the foregoing, I have probable cause to believe that on May 27, 2024, in the Eastern District of Michigan, Marcus Shauntrell Bond, possessed with the intent to distribute a controlled substance in violation of 21 U.S.C § 841(a)(1).



Nathan Sutara, Affiant  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means

on May 29, 2024.



HON. CURTIS IVY, JR.  
United States Magistrate Judge